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Attorney for Defendant –DANNY ELLIS

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

\* \* \*

UNITED STATES OF AMERICA,	)	2:13-CR-258-JAD (GWF)
	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
DANNY ELLIS,	)	
	)	
Defendant.	)	
_____	)	

**STIPULATION AND ORDER TO CONTINUE SENTENCING**

IT IS HEREBY STIPULATED AND AGREED by and between JESS R. MARCHESE, ESQ. Counsel for Defendant DANNY ELLIS and ROBERT KNIEF, Assistant United States Attorney, that sentencing currently scheduled for January 21, 2015 at 9:00 a.m., and, be vacated and reset to a date and time convenient to the court.

This Stipulation is entered into for the following reasons:

1. Counsel for the defendant has spoken to his client and he has no objection to the request for continuance.
2. Counsel for the defendant has spoken to AUSA Robert Knief and he has no objection to the continuance.

1           3. The defendant has not met with the government yet in order to meet his Safety Valve  
2           eligibility requirements.

3           4. For all the above-stated reasons, the ends of justice would best be served by a  
4           continuance of the sentencing until a date and time convenient to the court.  
5

6           This is the second request for continuance filed for this hearing.

7                     DATED: January 16, 2015  
8

9  
10                    \_\_\_\_\_/S/\_\_\_\_\_  
11           JESS R. MARCHESE, ESQ.  
12           601 S. LAS VEGAS BLVD.  
13           LAS VEGAS, NEVADA 89101  
14           ATTORNEY FOR THE DEFENDANT  
15           MARY MUSSO

                                  \_\_\_\_\_/S/\_\_\_\_\_  
ROBERT KNIEF, ESQ.  
ASSISTANT UNITED STATES ATTORNEY  
333 LAS VEGAS BOULEVARD SOUTH. #5000  
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ATTORNEY FOR UNITED STATES OF  
AMERICA

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**UNITED STATES DISTRICT COURT  
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UNITED STATES OF AMERICA,	)	2:13-CR-258-JAD (GWF)
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Plaintiff,	)	
	)	
v.	)	
	)	
DANNY ELLIS,	)	
	)	
Defendant.	)	

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**FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds:

This Stipulation is entered into for the following reasons:

1. Counsel for the defendant has spoken to his client and he has no objection to the request for continuance.
2. Counsel for the defendant has spoken to AUSA Robert Knief and he has no objection to the continuance.
3. The defendant has not met with the government yet in order to meet his Safety Valve eligibility requirements.
4. For all the above-stated reasons, the ends of justice would best be served by a

